## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

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DEBORAH CHIN, Individually And On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED, STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action No. 04-CV-10294-DPW

(additional captions to follow)

MOTION OF JEFFREY FOSS FOR THE CONSOLIDATION OF ALL RELATED ACTIONS, TO BE APPOINTED LEAD PLAINTIFF AND FOR THE APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL

MICHELLE TREBITSCH, Individually And On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED, STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

INFORMATION DYNAMICS, LLC, Individually And On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED, STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

PETER KALTMAN, Individually And On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED, STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action No. 04-cv-10307-DPW

Civil Action No. 04-cv-10308-DPW

Civil Action No. 04-cv-10309-DPW SAMANTHA DEN, Individually And On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED, STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

STEVE L. BAKER, Individually And On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED, STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

MICHAEL KAFFEE, Individually And On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED, STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action No. 04-cv-10310-DPW

Civil Action No. 04-cv-10333-DPW

Civil Action No. 04-cv-10345-DPW RONALD KASSOVER, Individually And On Behalf Of The Ronald Kassover IRA And All Others Similarly Situated,

Plaintiff,

VS.

PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED, STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

RICHARD CURTIS, Individually And On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED, STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

HAIMING HU, Individually And On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED, STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action No. 04-cv-10329-DPW

Civil Action No. 04-cv-10314-DPW

Civil Action No. 04-cv-10346-DPW DANIEL WILLIAMS, Individually and on behalf of all others similarly situated,

Plaintiff,

-vs.-

PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED, STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

CHARLES STARBUCK, Individually and on behalf of all others similarly situated,

Plaintiff,

-VS.-

PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED, STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

SANUEL HO, Individually and on behalf of all others similarly situated,

Plaintiff,

-vs.-

PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED, STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action No.:04-cv-10359-DPW

Civil Action. No. 04-CV-10362-DPW

Civil Action. No 04-cv-10363-DPW

ROBERT CONTE and MARK RESPLER, Individually and on behalf of all others similarly situated,

Plaintiffs.

-vs.-

Civil Action. No 04-cv-10382-DPW

PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED, STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

WHEATON ELECTRICAL SERVICES RETIREMENT 401K Profit Sharing Plan, on behalf of itself and all others similarly situated,

Plaintiffs,

-VS.-

Civil Action No 04-cv-10383

PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED, STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

JEFFREY C. RODRIGUES, Individually and on behalf of all others similarly situated,

Plaintiffs,

-VS.-

PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED, STEPHEN J. NILL, and SONUS NETWORKS, INC., Civil Action No 04-cv-10364-DPW

Defendants.

MICHELLE BURK, Derivatively on behalf of Sonus Networks, Inc., A Delaware Corporation,

Plaintiffs,

-Vs.-

HASSAN AHMED, EDWARD T. ANDERSON, PAUL J. FERRI, RUBIN GRUBER, PAUL SEVERINO, JOHN MICHAEL O'HARA, EDWARD N. HARRIS, STEPHEN NILL, PAUL R. JONES, and SONUS NETWORKS, INC., A Delaware Corporation,

Civil Action No 04-cv-10384-DPW

Defendants.

BRIAN CLARK, Individually and on behalf of all others similarly situated,

Plaintiff,

-vs.-

PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED, STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Civil Action No 04-cv-10454-DPW

Defendant.

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 42(a), and Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995 ("PSLRA"), Jeffrey Foss will move the Court for an Order: (i) consolidating the above captioned related actions pursuant to Rule 42(a) and any subsequently filed related cases; (ii) appointing Jeffrey Foss Lead Plaintiff in the consolidated action and any subsequently filed related cases; and (iii) approving his selection of Abbey Gardy, LLP as lead counsel.

This Motion is based on the accompanying Memorandum of Points and Authorities in support thereof, the Declaration of Nancy Kaboolian filed herewith, and all prior pleadings and proceedings herein, and such other written or oral argument as may be permitted by the Court.

DATED: New York, New York April 12, 2004

Respectfully submitted,

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